

EDWARD L. WRIGHT
(1903-1977)
ROBERT S. LINDSEY
(1913-1991)
ALSTON JENNINGS
(1917-2004)
GORDON S. RATHER, JR.
JOHN R. TISDALE
JOHN WILLIAM SPIVEY III
LEE J. MULBROW
N.M. NORTON
CHARLES T. COLEMAN
EDWIN L. LOWTHER, JR.
GREGORY T. JONES
WALTER McSPADDEN
JOHN D. DAVIS
JUDY SIMMONS HENRY
KIMBERLY WOOD TUCKER
RAY F. COX, JR.
TROY A. PRICE
KATHRYN A. PRYOR
J. MARK DAVIS
JERRY J. SALLINGS
WILLIAM STUART JACKSON
MICHAEL D. BARNES
STEPHEN R. LANCASTER
KYLE R. WILSON
C. TAD BOHANNON
J. CHARLES DOUGHERTY
M. SEAN HATCH
J. ANDREW VINES
JUSTIN T. ALLEN
MICHELLE M. KAEMMERLING
SCOTT ANDREW IRBY
PATRICK D. WILSON

WRIGHT, LINDSEY & JENNINGS LLP
ATTORNEYS AT LAW

200 WEST CAPITOL AVENUE, SUITE 2300
LITTLE ROCK, ARKANSAS 72201-3699
(501) 371-0808 • FAX (501) 376-9442

NORTHWEST ARKANSAS
3333 PINNACLE HILLS PARKWAY, SUITE 510
ROGERS, ARKANSAS 72758-8960
(479) 986-0888 • FAX (479) 986-8932

www.wlj.com

Writer's Direct Dial No. 501-212-1220
sjewell@wlj.com
Reply to Little Rock Office

DAVID P. GLOVER
REGINA A. YOUNG
PAUL D. MORRIS
EDWARD RIAL ARMSTRONG
GARY D. MARTS, JR.
ERIC BERGER
P. DELANNA PADILLA
CALEY B. VO
JOHNATHAN D. HORTON
KATHRYN M. IRBY
DAVID L. JONES
W. CARSON TUCKER
JANE A. KIM
ADRIENNE L. JUNG
KRISTEN S. MOYERS
ERIN S. BROGDON
RICHARD BLAKELY GLASGOW
DIANA BORGOGNONI SNYDER
PATRICK M. YOUNG
BIANCA M. RUCKER
ANTWAN D. PHILLIPS
MATTHEW A. GLOVER
BAXTER D. DRENNON
MICHAEL A. THOMPSON
SETH R. JEWELL
HAYDEN W. SHURGAR
COURTNEY C. McLARTY
OF COUNSEL
RONALD A. MAY
JOHN G. LILE
ROGER A. GLASGOW
ALSTON JENNINGS, JR.
BRUCE R. LINDSEY
JAMES R. VAN DOVER
CHARLES S. BOHANNON

April 18, 2012

VIA EMAIL: Stebbinsd@yahoo.com and
US MAIL

David Stebbins
123 W. Ridge St., Apt. D
Harrison, AR 72601

Re: David A. Stebbins v. Harp & Associates, LLC, USDC W.D. ARK Case No. 3:11-CV-3078

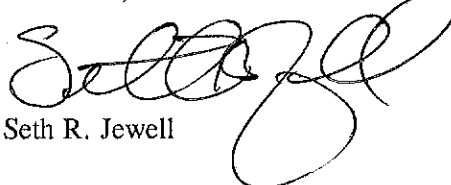
Mr. Stebbins,

Pursuant to Rules 33 and 34 of the Federal Rules of Civil Procedure, I am enclosing Defendant Harp & Associates, LLC's ("Harp") first set of Interrogatories and Requests for Production of Documents to be completed under oath. These Interrogatories and Requests for Production are being sent to you in connection with the above referenced matter. Under the time periods provided by Rules 33(b) and 34(b)(2) of the Federal Rules of Civil Procedure, I look forward to receiving your responses within thirty days of your receipt of these requests.

Thank you for your time and attention to this matter.

Cordially yours,

WRIGHT, LINDSEY & JENNINGS LLP


Seth R. Jewell

SRJ/tkw
Enclosure

IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF ARKANSAS
HARRISON DIVISION

DAVID A. STEBBINS

PLAINTIFF

VS.

NO. 3:11-CV- 03078-PKH

HARP & ASSOCIATES REAL ESTATE SERVICES

DEFENDANT

**DEFENDANT'S INTERROGATORIES AND REQUESTS FOR PRODUCTION
OF DOCUMENTS PROPOUNDED TO PLAINTIFF**

Defendant Harp & Associates LLC (incorrectly sued as "Harp & Associates Real Estate Services") propounds to plaintiff David A. Stebbins the following Interrogatories and Requests for Production of Documents pursuant to Rules 33 and 34 of the Federal Rules of Civil Procedure:

INTERROGATORY NO. 1: Please identify by name, title, place of employment, and address every witness that Plaintiff may call to testify as well as every witness that Plaintiff will actually call to testify at trial or any hearing in this matter, distinguishing those witnesses whom the Plaintiff knows will be called to testify.

RESPONSE:

INTERROGATORY NO. 2: Please identify the name, title, place of employment, address and subject of expected testimony for every person Plaintiff will call to testify as an expert witness at trial or any hearing in this matter, including those persons already named in response to Interrogatory No. 1.

RESPONSE:

REQUEST FOR PRODUCTION NO. 1: Please produce a copy of the curriculum vitae for each person identified in response to Interrogatory No. 2.

RESPONSE:

INTERROGATORY NO. 3: Please describe each item of evidence that you may use or offer into evidence at the trial of this case.

RESPONSE:

REQUEST FOR PRODUCTION NO. 2: Please produce the items identified in response to Interrogatory No. 3.

RESPONSE:

INTERROGATORY NO. 4: Please identify each person who assisted in preparation of the answers to these Interrogatories and responses to Requests for Production of Documents.

RESPONSE:

INTERROGATORY NO. 5: Please state and identify the facts that support your contention that Harp & Associates' allegations in the February 15, 2011 eviction notice were factually inaccurate, and that you can prove that the allegations were inaccurate, as alleged in Paragraph 3 of your Complaint.

RESPONSE:

REQUEST FOR PRODUCTION NO. 3: Please produce a copy of the February 15, 2011 notice of eviction, including but not limited to any letter or attachment that accompanied the notice of eviction, referred to in Paragraphs 2 and 3 of your Complaint.

RESPONSE:

REQUEST FOR PRODUCTION NO. 4: Please produce copies of any and all evidence in document form that will prove the allegations in the February 15, 2011 eviction notice were factually inaccurate, as described and alleged in Paragraph 3 of your Complaint.

RESPONSE:

INTERROGATORY NO. 6: Please state and identify the facts that support your contention that you were receiving Section 8 Federal Housing Benefits and had the right to only be evicted for “just cause,” as alleged in Paragraph 4 of your Complaint.

RESPONSE:

REQUEST FOR PRODUCTION NO. 5: Please produce copies of any and all documents that in any way relate to your Section 8 Federal Housing Benefits, as described and alleged in Paragraph 4 of your Complaint, including any application for those benefits.

RESPONSE:

REQUEST FOR PRODUCTION NO. 6: Please produce copies of any and all documents submitted to or received from the Section 8 Housing Office regarding the fires in the apartment at issue in this case.

RESPONSE:

REQUEST FOR PRODUCTION NO. 7: Please produce any documentation submitted to an insurance company for any losses related to the fires in your apartment.

RESPONSE:

REQUEST FOR PRODUCTION NO. 8: Please produce all other documentation that in any way relates to the fires in your apartment.

RESPONSE:

INTERROGATORY NO. 7: Please state and identify the facts that support your contention that you suffer from Asperger Syndrome.

RESPONSE:

INTERROGATORY NO. 8: Please identify by name, home or business address and telephone number all doctors you have visited over the past eight (8) years in relation to your Asperger Syndrome.

RESPONSE:

REQUEST FOR PRODUCTION NO. 9: Please produce any and all documents that in any way relate to your Asperger Syndrome, including but not limited to any and all medical documentation and records.

RESPONSE:

INTERROGATORY NO. 9: Please state and identify the facts and circumstances that support your contention that you are “most commonly discriminated against because of [your] Asperger Syndrome”, as alleged in Paragraph 7 of your Complaint, including but not limited to, a complete and accurate description of each instance in which you were discriminated against because of your Asperger Syndrome.

RESPONSE:

INTERROGATORY NO. 10: Please state and identify the facts that support your contention that your Asperger Syndrome was “the next most likely explanation for [your] eviction”, as alleged in Paragraph 7 of your Complaint.

RESPONSE:

INTERROGATORY NO. 11: Please state, identify, and describe any and all problems or difficulties that you had in paying rent to Harp & Associates, including late and insufficient payments.

RESPONSE:

INTERROGATORY NO. 12: Please identify your residences over the past eight (8) years, including, but not limited to, the addresses, the length of stay, the amount of rent paid, and the identity of the operator of the apartment complex (if residence was in an apartment complex).

RESPONSE:

REQUEST FOR PRODUCTION NO. 10: Please produce copies of any and all documents pertaining to contracts or lease agreements that you entered into with a landlord in the past eight (8) years.

RESPONSE:

INTERROGATORY NO. 13: State whether you have any documents, statements, reports, tape recordings, or memoranda attributable to any past or present employee or agent of Harp & Associates LLC concerning the allegations in your complaint.

RESPONSE:

REQUEST FOR PRODUCTION NO. 11: Please produce a copy of the document, statement, report, recording or memoranda identified in response to Interrogatory No. 13.

RESPONSE:

INTERROGATORY NO. 14: If you or anyone on your behalf has had any conversations with any past or present employee or agent of Harp & Associates LLC concerning the allegations in your complaint, then for each conversation, please state the following:

- a. The method of conversation;
- b. The name, title, place of employment, address, telephone number, and relationship with Plaintiff of each individual participating in the conversation;
- c. The date of the conversation;
- d. A brief description of what was said during the course of the conversation; and

RESPONSE:

INTERROGATORY NO. 15: Please list the case style, case number, and court for each lawsuit (including criminal matters and bankruptcies) in which you have been either a plaintiff, a defendant, or a party in the past eight (8) years.

RESPONSE:

REQUEST FOR PRODUCTION NO. 12: Please produce all documentation sent by you to Harp & Associates LLC between January 1, 2009 and

December 31, 2011, including but not limited to letters, memoranda, emails, contracts, or any other electronic or written communication.

RESPONSE:

REQUEST FOR PRODUCTION NO. 13: Please produce all documents (in paper or electronic format) including, but not limited to, notes, personal diaries, account of events, notebooks, logs, emails, or correspondence that relate to the allegations in your complaint.

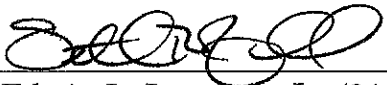
RESPONSE:

REQUEST FOR PRODUCTION NO. 14: Please produce all correspondence between you, or anyone acting on your behalf, and Harp & Associates LLC, including any current or former employee, agent or representative of Harp & Associates LLC.

RESPONSE:

Respectfully submitted,

WRIGHT, LINDSEY & JENNINGS LLP
200 West Capitol Avenue, Suite 2300
Little Rock, Arkansas 72201-3699
(501) 371-0808
FAX: (501) 376-9442
E-MAIL: elowther@wlj.com
sjewell@wlj.com

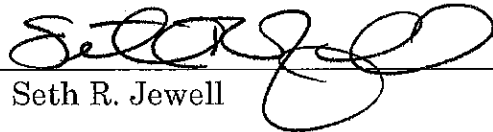
By 
Edwin L. Lowther, Jr. (81107)
Seth R. Jewell (2011175)
Attorneys for Defendant

CERTIFICATE OF SERVICE

On April 18th, 2012, a copy of the foregoing was served by First Class U.S.

Mail and by email on the following:

David Stebbins
123 W. Ridge, Apt. D
Harrison, AR 72601
stebbinsd@yahoo.com


Seth R. Jewell